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HAND DELIVERED

August 7, 2007

The Honorable Judge Lagueux  
United States District Court  
for the District of Rhode Island  
One Exchange Terrace  
Providence, RI 02903

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District of Rhode Island

Re: Estate of Yaron Ungar, et al. v. The Palestinian Authority, et al.  
C.A. No. 00-105L

Dear Judge Lagueux:

I write in response to the letter to Your Honor dated August 7, 2007, from James R. Oswald, counsel for the Canaan entities.

Mr. Oswald's claim that the Ungars' Reply is nine months late is incorrect and misleading. Our motion and the time for filing our Reply were stayed with Canaan's agreement during the pendency of the declaratory judgment action brought by LeBoeuf Lamb. That action was dismissed on June 19, 2007. The filing of our Reply was then delayed for several weeks while we were seeking and retaining an affiant to attest to the matters discussed in Exhibit A of the Reply.

Mr. Oswald's further claim that the issue of the Ungars' ownership is yet to be determined, and will not be determined by this Court, is astonishing, since it flies in the face both of this Court's judgments of September 19, 2006, and the very explicit statements made by the Court at the hearing in the LeBoeuf matter on June 19, 2007.<sup>1</sup>

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<sup>1</sup> Mr. Oswald's reference to an "alter ego" determination appears to be the result of some confusion on his part. The Ungars have never asserted any "alter ego" claims in respect to the PIF in this Court or in the Connecticut court.

Mr. Oswald's ostensible determination that the Connecticut court, and not this Court, will decide the issue of ownership is also incorrect as a simple factual matter. On November 29, 2006, proceedings in Connecticut were adjourned pending the outcome of both the LeBoeuf suit and the Motion to Modify.

Thus, Mr. Oswald has it exactly backwards: the continuation of the Ungars' enforcement proceedings in Connecticut are to resume once this Court has ruled on the Motion to Modify.

Our long-pending motion is ripe for decision, and Mr. Oswald's letter has presented no new grounds whatsoever in opposition thereto.

Accordingly, we respectfully request that Your Honor grant the motion forthwith.

Sincerely,



David Strachman

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